

MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Lorenzo Marinuzzi
Norman S. Rosenbaum

*Counsel for The Post-Effective Date
Debtors, The ResCap Liquidating Trust
and The ResCap Borrower Claims Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**AMENDED¹ PROPOSED AGENDA FOR MATTERS SCHEDULED
TO BE HEARD ON JUNE 10, 2014 AT 10:00 A.M. (EST)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton U.S. Custom House, Courtroom 501, One Bowling Green, New York, NY
10004-1408

I. RESOLVED MATTER(S)

1. Request of Verizon Business Network Services, Inc. for Allowance and Payment of Administrative Expense Claim [Docket No. 6253]

Related Document(s):

- a. Notice of Adjournment of Hearing on Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim to February 6, 2014 at 10:00 A.M. [Docket No. 6381]
- b. Notice of Adjournment of Hearing on Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim to February 20, 2014 at 10:00 a.m. [Docket No. 6434]

¹ Amended items appear in **bold**.

- c. Notice of Adjournment of Hearing on Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim to May 15, 2014 at 10:00 a.m. [Docket No. 6798]
- d. Notice of Adjournment of Hearing on Request of Verizon Business Network Services, Inc. for Allowance and Payment of Administrative Expense Claim to June 10, 2014 at 10:00 a.m. [Docket No. 6936]
- e. **Notice of Withdrawal of Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim [Docket No. 7079]**

Response(s):

- a. Objection of the Liquidating Trust to Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim [Docket No. 6340]
 - (i) Declaration of Deanna Horst in Support of Objection of The Liquidating Trust to Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim [Docket No. 6341]
- b. Statement of the Liquidating Trust in Connection with Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim [Docket No. 6502]

Reply:

- a. Reply of Verizon Business Network Services Inc. In Support of Request for Allowance and Payment of Administrative Expense Claim [Docket No. 6372]

Status: The motion is resolved, and a hearing is not necessary. The ResCap Liquidating Trust has filed a notice withdrawing the motion.

- 2. The ResCap Liquidating Trust's First Omnibus Motion Requesting Approval to Amend the Debtors' Schedules [Docket No. 6865]

Related Document(s):

- a. Notice of Extension of Deadlines for Submission of Responses [Docket No. 7001]
- b. **Order Granting Debtors' First Omnibus Motion Requesting Approval to Amend the Debtors' Schedules [Docket No. 7078]**

Response(s): None.

Status: An order granting the motion has been entered by the Court. No hearing is required.

II. ADJOURNED MATTER(S)

1. Motion of Simona Robinson for Relief from Stay [Docket No. 4948]

Related Document(s):

- a.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay [Docket No. 5063]
- b.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to December 17, 2013 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 5311]
- c.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to January 9, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6081]
- d.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to February 6, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6324]
- e.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to February 20, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6403]
- f.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to March 11, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6492]
- g.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to April 10, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6680]
- h.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to April 24, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6754]
- i.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to May 15, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6804]
- j.** Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to May 29, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6935]

- k. Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to June 10, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7006]
- l. Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to June 26, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7066]

Response(s):

- a. Debtors' Objection to Motion of Simona Robinson for Relief from Stay [Docket No. 5261]
- b. Objection of Ocwen Loan Servicing LLC to Motion of Simona Robinson for Relief from Stay [Docket No. 5262]

Reply:

- a. Simona Robinson's Reply to the Opposition of ResCap and Ocwen to Motion for Relief from Automatic Stay [Docket Nos. 5285 and 5304]

Status: The hearing on this matter has been adjourned to June 26, 2014.

- 2. Motion of the ResCap Liquidating Trust for an Order Enforcing Plan Injunction Against Karla Brown [Docket No. 6687]

Related Document(s):

- a. Declaration of Joseph A. Shifer in Support of the Motion of the ResCap Liquidating Trust for an Order Enforcing Plan Injunction Against Karla Brown [Docket No. 6688]
- b. Notice of Adjournment of Hearing on Motion of the ResCap Liquidating Trust for an Order Enforcing Plan Injunction Against Karla Brown to April 24, 2014 at 10:00 a.m. [Docket No. 6716]
- c. Letter dated May 27, 2014 from Douglas H. Mannal to the Court regarding status of parties' settlement discussions [Docket No. 7005]
- d. Letter dated June 2, 2014 from Joseph A. Shifer to the Court regarding status of parties' settlement discussions [Docket No. 7037]

Response(s):

- a. Karla Brown's Opposition to the Motion of the Liquidating for an Order Enforcing Plan Injunction Against Karla Brown [Docket No. 6794]

Reply:

- a. Reply of the ResCap Liquidating Trust in Support of its Motion for an Order Enforcing Plan Injunction Against Karla Brown [Docket No. 6807]

Status: The hearing on this matter has been adjourned to June 26, 2014.

- 3. Clifford Lantz's Motion for Relief from the Automatic Stay Pursuant to § 362 and § 1301 [Docket No. 6817]

Related Document(s):

- a. Notice of Hearing on Creditor Clifford Lantz Motion for Relief from the Automatic Stay Pursuant to § 362 and § 1301 [Docket No. 6858]
- b. Creditor Clifford Lantz's *Ex Parte* Motion to Appear Telephonically by Attorney Jared B. Pearson [Docket No. 6859]
- c. Notice of Adjournment of Hearing on Motion of Clifford Lantz for Relief from the Automatic Stay Pursuant to § 362 and § 1301 to July 9, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7072]

Response(s):

- a. ResCap Liquidating Trust's Objection to Cliff Lantz's Motion for Relief From the Automatic Stay Pursuant to Section 362 and Section 1301 [Docket No. 7045]

Status: The hearing on this matter has been adjourned to July 9, 2014.

- 4. Ally Financial Inc.'s Motion for an Order Enforcing the Courts Order Granting Debtors Motion for an Order Under Bankruptcy Code Sections 105(a) and 363(b) Authorizing the Debtors to Enter Into a Plan Support Agreement with Ally Financial Inc., the Creditors' Committee, and Certain Consenting Claimants [Docket No. 6981]

Related Document(s):

- a. Notice of Adjournment of Hearing on Ally Financial Inc.'s Motion for an Order Enforcing the Court's Order Granting Debtors' Motion for an Order Under Bankruptcy Code Sections 105(a) and 363(b) Authorizing the Debtors to Enter Into a Plan Support Agreement with Ally Financial Inc., the Creditors' Committee, and Certain Consenting Claimants [Docket No. 7051]

Response(s): None.

Status: The hearing on this matter has been adjourned to June 26, 2014.

III. CLAIMS OBJECTIONS

1. Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) [Docket No. 6077]

Related Document(s):

- a. Notice of Adjournment of Hearing as to Certain Claims on (A) Debtors' Fifty-Second Omnibus Objections to Claims (Insufficient Documentation), and (B) Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) [Docket No. 6210]
- b. Notice of Adjournment of Hearing on Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability- Assigned Contract claims) Solely as it Related to the Claims Filed by California Housing Finance Agency to April 10, 2014 at 10:00 a.m. [Docket No. 6563]
- c. Notice of Adjournment of Hearing on Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) Solely as it Relates to the Claims Filed by Federal Home Loan Mortgage Corporation to April 10, 2014 at 10:00 a.m. [Docket No. 6644]
- d. Notice of Adjournment of Hearing on Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) Solely as it Relates to the Claims Filed by California Housing Finance Agency to June 10, 2014 at 10:00 a.m. [Docket No. 6746]
- e. **Notice of Withdrawal of Claim No. 4631 Filed by California Housing Finance Agency [Docket No. 7077]**

Response(s):

- a. Opposition of California Housing Finance Agency to Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability- Assigned Contract Claims) [Docket No. 6216]

Status: This matter, solely as it relates to the claims filed by California Housing Finance Agency, has been resolved. No hearing is required.

2. The ResCap Borrower Claims Trust's Sixty-Second Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 6815]

Related Document(s):

- a. Notice of Adjournment of Hearing on the ResCap Borrower Claims Trust's Sixty-Second Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claim Filed by Charles and Phyllis

Carlin (Claim No. 3879) to July 9, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7058]

Response(s):

- a. Scott and Linda Ewing's Response to The ResCap Borrower Claims Trust's Sixty-Second Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 6974]
- b. Response of Joseph J. Cozzolino to The ResCap Borrower Claims Trust's Sixty-Second Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 6986]
- c. Response of Tomas Diaz to The ResCap Borrower Claims Trust's Sixty-Second Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 7013]
 - (i) Tomas Diaz's Supplemental Response to Debtors' Objection to Claim No. 4702 [Docket No. 7059]
- d. Response of Michelle Lawson to The ResCap Borrower Claims Trust's Sixty-Second Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 7040]

Reply:

- a. ResCap Borrower Claims Trust's Omnibus Reply In Support of Its Sixty-Second Omnibus Objection to Claims (No-Liability Borrower Claims) as to Claim Nos. 1372, 2152, 4702, and 5282 [Docket No. 7062]

Status: The hearing on this matter, solely as it relates to the claim filed Charles and Phyllis Carlin, has been adjourned to July 9, 2014. The hearing on this matter as it relates to all other claimants will be going forward.

- 3. The ResCap Liquidating Trust's Sixty-Third Omnibus Claims Objection (Purported Administrative Claims) [Docket No. 6845]

Related Document(s):

- a. Norma E. Rodriguez's Declaration in Support of her Timely Proof of Claim [Docket No. 6809]

Response(s):

- a. Response of Vicki West to The ResCap Liquidating Trust's Sixty-Third Omnibus Claims Objection (Purported Administrative Claims) [Docket No. 6871]

- b. Tom Franklin's Objection to The ResCap Liquidating Trust's Sixty-Third Omnibus Claims Objection (Purported Administrative Claims) [Docket No. 6955]
 - (i) Second Response of Tom Franklin in Opposition to Stay and Removing Movant from Case and Eliminating his Claim and Elimination of Stipulation Order [Docket No. 6967]
- c. Response of Norma E. Rodriguez to The ResCap Liquidating Trust's Sixty-Third Omnibus Claims Objection (Purported Administrative Claims) [Docket No. 6987]
- d. Opposition of Charles T. Clark to Debtors' Objection of Purported Administrative Claims (Claim No. 7315) [Docket No. 6973]
- e. Response of Tamara Carlson-Callahan to The ResCap Liquidating Trust's Sixty-Third Omnibus Claims Objection (Purported Administrative Claims) [Docket No. 6992]

Reply:

- a. ResCap Liquidating Trust's Reply in Support of its Sixty-Third Omnibus Claims Objection (Purported Administrative Claims) [Docket No. 7057]

Status: The hearing on this matter will be going forward.

- 4. The ResCap Liquidating Trust's Sixty-Fourth Omnibus Claims Objection (No Liability Tax Claims) [Docket No. 6846]

Related Document(s):

- a. Notice of Withdrawal of the ResCap Liquidating Trust's Sixty-Fourth Omnibus Claims Objection (No Liability Tax Claims) Solely as it Relates to the Claim Filed by Galveston County (Claim No. 6956) [Docket No. 7048]
- b. Notice of Adjournment of Hearing on The ResCap Liquidating Trust's Sixty-Fourth Omnibus Claims Objection (No Liability Tax Claims) Solely as it Relates to the Claim Filed by the Marion County Treasurer (Claim No. 1915) to July 30, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7049]

Response(s):

- a. Response of Marion County Treasurer to Debtors' Sixty-Fourth Omnibus Claims Objection (No Liability Tax Claims) [Docket No. 7000]

Status: This matter, solely as it relates to the claim filed by Galveston County, has been withdrawn. The hearing on this matter, solely as it relates to the claim filed by Marion Tax County, has been adjourned to July 30, 2014. The hearing on this matter as it relates to all other claimants will be going forward.

5. The ResCap Liquidating Trust's Sixty-Fifth Omnibus Claims Objection (No Liability Claims) [Docket No. 6847]

Related Document(s): None.

Response(s): None.

Status: The hearing on this matter will be going forward.

6. ResCap Liquidating Trust's Sixty-Sixth Omnibus Objection to Claims (I) Expunging Amended and Superseded Claims; (II) Redesignating and Allowing Claims; (III) Reducing and Allowing Claims; and (IV) Redesignating, Reducing and Allowing Claims [Docket No. 6848]

Related Document(s):

- a. Notice of Withdrawal of ResCap Liquidating Trust's Sixty-Sixth Omnibus Objection to Claims (I) Expunging Amended and Superseded Claims; (II) Redesignating and Allowing Claims; (III) Reducing and Allowing Claims; and (IV) Redesignating, Reducing and Allowing Claims Solely as it Relates to the Claim Filed by Weir & Partners LLP (Claim No. 1182) [Docket No. 6995]

Response(s):

- a. Response of the Law Office of Robert C. Dougherty to The ResCap Liquidating Trust's Sixty-Sixth Omnibus Objection to Claims (I) Expunging Amended and Superseded Claims; (II) Redesignating and Allowing Claims; (III) Reducing and Allowing Claims; and (IV) Redesignating, Reducing and Allowing Claims [Docket No. 6965]

Status: The Liquidating Trust and Law Offices of Robert C. Dougherty resolved claimant's response to the Objection and agreed to a modified reduced and allowed claim amount, which will be reflected in the exhibit appended to the proposed order. The Liquidating Trust has withdrawn its objection to the claim filed by Weir & Partners LLP (Claim No. 1182). The hearing on this matter as it relates to all other claimants will be going forward.

Dated: June 9, 2014
New York, New York

/s/ Norman S. Rosenbaum
Lorenzo Marinuzzi
Norman S. Rosenbaum
MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900

*Counsel for The Post-Effective Date
Debtors, The ResCap Liquidating Trust
and The ResCap Borrower Claims Trust*